

Exhibit E

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION, :
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 Plaintiff, : **20 Civ. 10832 (AT) (SN)**
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 - against - : **ECF Case**
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:
RIPPLE LABS, INC., BRADLEY GARLINGHOUSE, :
and CHRISTIAN A. LARSEN, :
:
:
 Defendants. :
:
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DECLARATION OF VANESSA A. COUNTRYMAN

I, Vanessa A. Countryman, pursuant to 28 U.S.C. § 1746, hereby declare that:

1. I am the Secretary of the United States Securities and Exchange Commission (“Commission”).
2. This declaration is being made based on my personal knowledge and I would be competent to testify to the facts set forth in this declaration if I were called as a witness at trial.
3. On August 17, 2021, the Commission, through its Deputy General Counsel for General Law and Management, to whom it has delegated the authority to assert the governmental privileges, and who gave personal consideration to the matter, determined on behalf of the Commission, to assert a claim of governmental deliberative process privilege over the documents on the following privileges log in *SEC v. Ripple Labs, Inc. et al.*, Case No. 20-cv-10832 (S.D.N.Y.), that are marked as protected by the deliberative process privilege (with the exception of the documents noted in the August 17, 2021 Declaration of Mark Tallarico):

- SEC Privilege Log, dated June 21, 2021;
- SEC Privilege Log, dated July 14, 2021;

- SEC Privilege Log 2, dated July 21, 2021;
- SEC Privilege Log 1, dated July 23, 2021; and
- SEC Privilege Log 2, dated July 23, 2021, and amended August 6, 2021.

4. The deliberative process privilege is being asserted as to these documents because they reveal the SEC staff's thoughts and views in making decisions relating to the oversight of digital assets under the federal securities laws and the Commission's regulatory framework as well as the thoughts and views of staff from other agencies of the United States and from the governments of other countries about the regulation of digital assets. The production of these deliberative materials would likely have an inhibiting effect upon the fullness and frankness of written expression among the Commission and its staff members and thus would have a detrimental effect on the Commission's decision-making process.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on August 17, 2021, in Washington, D.C.



Vanessa A. Countryman